

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LOCAL 2507, UNIFORMED EMTs, PARAMEDICS &
FIRE INSPECTORS, Individually and on behalf of its
current and former members; LOCAL 3621, EMS
OFFICERS UNION, Individually and on behalf of its
current and former members; NYC EMS SUPERIOR
OFFICERS ASSOCIATION, Individually and on behalf
of its current and former members; TONYA BOYD,
CHRISTELL CADET, MARK CARRASQUILLO,
LIZETTE CLARO, BEVERLY COBB, ALI COUTARD,
SENCIA DATILUS, LAITRICE EDWARDS, ALICIA
ELKADI, RONALD FLOYD, KAHLIA GRAHAM,
RICHARD GUZMAN, MAGGIE HOPE, JASMIN
HOWARD, ANGELA JONES, RAVIVARMAN
KAILAYANATHAN, MELANIE MORENO-
KETCHUM, JENELLE PIERRE, SIMONE QUASHIE,
JASON SAFFON, ALLISON SHAUGHNESSY,
LAURA TORRES, ANDRE VALDEZ, LANCE
WINFIELD, RONALD WOLFE, MARYLOU
AURRICHIO on behalf of themselves and all other
similarly-situated individuals,

Case No. 22-cv-10336 (AT) (GWG)
[rel. 20-cv-3389]

Plaintiffs,

-against-

CITY OF NEW YORK on behalf of the Fire Department
of the City of New York,

Defendant.

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PLAINTIFFS' NOTICE OF DEPOSITION PURSUANT TO FRCP 30(b)(6)

TO: Lora Minicucci
New York City Law Department
Attorneys for Defendant
100 Church Street
New York, New York 10007

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure,
Plaintiffs, represented by The Kurland Group, the undersigned attorneys, with offices at 85 Broad
Street, 18th Floor, New York, New York, 10004, will take the following deposition before an

officer qualified to administer oaths, to be recorded by a stenographer and by audiovisual recording, on an agreed-upon date and in the manner directed by Plaintiffs. The deposition shall continue from day to day, or upon such adjourned dates as may be agreed upon, until completed.

A representative of DEFENDANT with knowledge regarding the datasets produced by Defendant in this action with regards to demographic and pay data, CAD data, injury, illness and workplace violence data, promotions and hiring to the Firefighter positions, and expressions of interest, to answer questions regarding how the data was collected and prepared, i.e. what database(s) and/or applications they were retrieved from, what codes were used to retrieve them, what data are contained in each dataset, as well as the meaning of any abbreviations or codes in those datasets.

PLEASE TAKE FURTHER NOTICE that deponents are required to bring with them to the depositions the records within their possession, custody or control which they will rely upon during the deposition, including but not limited to the following:

1. Documents exchanged between or among the parties hereto or their agents, including but not limited to those regarding the topics outlined above;
2. Documents and/or code, upon which Defendant relies, or will rely, concerning the datasets;
3. Documents created by, or on behalf of, Defendant and/or in Defendant's possession that evaluate, assess, critique or review the information and topics stated above;
4. Documents that support Plaintiffs' claims; and
5. Documents that support Defendant's defenses.

☐ **“DOCUMENT”** or **“DOCUMENTS”** or **“RECORD”** or **“RECORDS”** shall mean the original and all drafts of all written or graphic matter, however produced or reproduced, of any kind or drafts of all written or graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof that are different in any way from the original (whether by interlineation, receipt stamp, notation, indication of copies sent or received, or otherwise), including, without limitation, any paper, book, booklet, periodical, written description, account, photograph, blue print, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material correspondence, letter, telegram, telex, object, report,

opinion, investigation, record, transcription, study, note, notation, memo book entry, journal entry, diary entry, Day-timer entry, text message, instant message (“IM”), posting, notes, or messages on social networking sites (Facebook, Instagram, Twitter, LinkedIn, etc.), Filo-fax entry, calendar entry, board minutes, board resolution, working paper, summary, intraoffice communication, diary, chart, index sheet, computer software, computer diskette, check, check stub, delivery ticket, bill of lading, invoice, telephone message pad, telephone message form books, records, recording, or summary of any telephone or other conversations, of any interview, of any conference, meeting, or hearing, or of any written, recorded, transcribed, taped, videotaped, filmed, or graphic matter or of any other data compilation from which information can be obtained, translated, transmitted or transcribed, of which Defendants’ attorneys or agents have or have had possession, custody, or control, or of which Defendants’ attorneys or agents have any knowledge.

Dated: June 23, 2025
New York, New York

Respectfully submitted,

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Yetta G. Kurland
THE KURLAND GROUP
Attorneys for Plaintiffs
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New York, New York 10004